

# WEINER LAW GROUP LLP

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**LAWRENCE M. BERKELEY**  
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March 24, 2022

**Via Electronic Filing**

Clerk, United States District Court  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

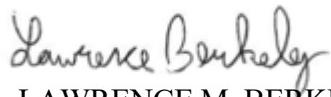
**Re: Han, Michelle & Alex v. Costco Wholesale Corporation, et al.**  
**Docket No.: BER-L-1029-22**  
**Our File No.: COST-157**

Dear Sir/Madam:

Enclosed please find Petition for Removal on behalf of Defendant, Costco Wholesale Corporation. Please file same. By copy of this letter, we are advising our adversary of this Petition.

Thank you for your courtesy in this regard.

Respectfully submitted,

  
LAWRENCE M. BERKELEY  
A Member of the Firm

Enclosures.

cc: Clerk, Superior Court of New Jersey, Essex County (via electronic filing)  
Zachary T. Fried, Esq. (via electronic filing)

**Weiner Law Group LLP**

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Attorneys for Defendant, **Costco Wholesale Corporation**  
Our File No. COST-157

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**MICHELLE C. HAN and ALEX HAN**

**Plaintiffs**

**vs.**

**COSTCO WHOLESALE CORP., ABC,  
INC. 1-5 and JOHN DOES 1-5**

**CIVIL ACTION NO.:**

**Defendants.**

**PETITION FOR REMOVAL**

Petitioner, Costco Wholesale Corporation, by its attorneys, Weiner Law Group, LLP, respectfully petitions the United States District Court for the District of New Jersey as follows:

1. This case was commenced on February 18, 2022 in the Superior Court of New Jersey, Law Division, Bergen County. Suit is identified in the Superior Court as Han Michelle v. Costco Wholesale Corporation, et al. Docket No. BER-L-1029-22. (See Exhibit A).

2. Costco Wholesale Corporation first received a copy of the Complaint on March 3, 2022, when Plaintiffs caused a copy to be served upon the General Manager of the Costco Warehouse located at 50 Overlook Boulevard, Nanuet, New York 10954. (See Exhibit B).

3. The filing of this Petition for Removal is timely because it is filed within thirty days of the date Costco Wholesale Corporation first received notice of the lawsuit.

4. Plaintiffs' Complaint in the Superior Court of New Jersey, Law Division, Bergen County, asserts damages of a non-specified amount. Plaintiffs allegedly sustained injuries as a result of an incident in which Michelle C. Han tripped and fell in the parking lot of the Nanuet New York Costco warehouse. As such, Defendant Costco Wholesale Corporation believes the amount in controversy exceeds \$75,000, exclusive of interest and costs.

5. Costco Wholesale Corporation is informed and believes that Plaintiffs are individual citizens of the State of New Jersey.

6. Defendant/petitioner, Costco Wholesale Corporation, is a Washington corporation and its principal place of business is 999 Lake Drive, Issaquah, Washington 98027.

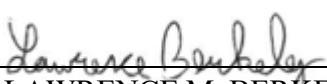
7. Therefore, complete diversity exists among the parties.

8. Accordingly, this action is removable to this Court pursuant to 28 U.S.C. § 1441.

**WHEREFORE**, Petitioner, Costco Wholesale Corporation, Defendant in the action described herein, which is currently pending in the Superior Court of the State of New Jersey, Law Division, Bergen County, Docket No. BER-L-1029-22, prays that this action be removed therefrom to this Court.

WEINER LAW GROUP LLP  
**Attorney for Defendant, Costco Wholesale Corp.**

Dated: March 24, 2022

BY:   
LAWRENCE M. BERKELEY, ESQ.  
(LMB-7706)

I certify that a true copy of the Summons and Complaint filed in the Superior Court of the State of New Jersey, County of Bergen, is annexed hereto as Exhibit A. I certify that a true copy of the proof of service served upon the General Manager of the Costco Warehouse located at 50 Overlook Boulevard, Nanuet, New York 10954 is annexed hereto as Exhibit B.

WEINER LAW GROUP LLP  
**Attorney for Defendant, Costco Wholesale Corp.**

Dated: March 24, 2022

BY:   
LAWRENCE M. BERKELEY, ESQ.  
(LMB-7706)